

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

LARRIEN BROWN-AUSTIN, aka "Chico",  
SHANNON MARZANO, and  
LARRY BROWN-AUSTIN

Defendant.

SECRET INDICTMENT

CASE NO.

Title 18, Sections 1594(c),  
1591(a)(1), (b)(1), and 2, United  
States Code

**JUDGE BARKER**

COUNT 1

(Conspiracy to Commit Sex Trafficking by Force, Threats of Force, Fraud, and Coercion,  
18 U.S.C. §§1594(c))

The Grand Jury charges:

1. From in or about June 2018 and continuing through on or about August 20, 2018, in the Northern District of Ohio, Eastern Division, Defendants LARRIEN BROWN-AUSTIN, aka "Chico," SHANNON MARZANO, LARRY BROWN-AUSTIN, and others known and unknown to the Grand Jury, did knowingly and intentionally combine, conspire, confederate and agree with each other and others known and unknown to the grand jury, to commit offenses against the United States, as set forth in 18 U.S.C. 1591, specifically:

2. To knowingly recruit, entice, harbor, transport, provide, obtain, and maintain by any means a person, namely Victim #1 and Victim #2 (whose identities are known to the Grand Jury) by means of force, threats of force, fraud, coercion, and any combination of such means, knowing that such means would be used to cause Victim #1 and Victim #2 to engage in a commercial sex act, in violation of Title 18, United States Code, Section 1591(a)(1)); and

3. To knowingly benefit, financially and by receiving anything of value, from participation in a venture which engaged in an act described above in paragraph 2 of this Indictment and which would constitute a violation of 18 U.S.C. 1591(a)(1), in violation of Title 18 U.S.C. 1591(a)(2).

Manner and Means of Conspiracy

4. It was part of the conspiracy that Defendants LARRIEN BROWN-AUSTIN, aka “Chico,” SHANNON MARZANO and LARRY BROWN-AUSTIN provided controlled substances, including heroin, cocaine, and methamphetamine, to Victim #1, Victim #2, and others known and unknown to the Grand Jury, to induce Victim #1 and Victim #2 to engage in commercial sex acts.

5. It was further part of the conspiracy that Defendants LARRIEN BROWN-AUSTIN, aka “Chico,” and SHANNON MARZANO withheld controlled substances, including heroin, cocaine, and methamphetamine, from Victim #1, Victim #2, and others known and unknown to the Grand Jury, knowing Victim #1, Victim #2 and others were addicted to the controlled substances and would experience intense withdrawal symptoms, in order to coerce Victim #1, Victim #2 and others to engage in commercial sex acts.

6. It was further part of the conspiracy that LARRIEN BROWN-AUSTIN, aka “Chico,” and SHANNON MARZANO posted and caused others to post advertisements for commercial sex, which included photographs of Victim #1, Victim #2 and others on [www.backpage.com](http://www.backpage.com) (“Backpage”) and [www.skipthegames.com](http://www.skipthegames.com), (“Skip the Games”), two separate interstate commercial websites, the later dedicated to commercial sex acts.

7. It was further part of the conspiracy that LARRIEN BROWN-AUSTIN, aka “Chico,” SHANNON MARZANO and LARRY BROWN-AUSTIN, and others both known and unknown to the Grand Jury, provided clothing, food, housing, and condoms to Victim #1, Victim #2 and others to facilitate commercial sex acts.

8. It was further part of the conspiracy that LARRIEN BROWN-AUSTIN, aka “Chico,” and SHANNON MARZANO, and others known and unknown to the Grand Jury, used vehicles, public highways, hotels, telephones and the internet to facilitate commercial sex acts.

9. It was further part of the conspiracy that LARRIEN BROWN-AUSTIN, aka “Chico,” SHANNON MARZANO and LARRY BROWN-AUSTIN, and others known and unknown to the conspiracy, received monies and other things of value by having the victims engage in commercial sex acts.

10. It was further part of the conspiracy that LARRIEN BROWN-AUSTIN, aka “Chico,” SHANNON MARZANO and LARRY BROWN-AUSTIN used and caused to be used force, threats of force, fraud and coercion to compel the victims to engage in commercial sex acts.

Acts in Furtherance of the Conspiracy

11. In furtherance of this conspiracy, and to accomplish its objectives, the Defendants committed the following acts, among others, in the Northern District of Ohio, Eastern Division:

- a. At all times material to the Indictment, LARRY BROWN AUSTIN owned and maintained residential real property, the address of which is known to the Grand Jury and located in Canton, Ohio (hereafter “Canton Residence”), with knowledge that the residence was routinely used for commercial sex acts.

- b. From in or about June 2018 through August 20, 2018, LARRY BROWN-AUSTIN provided a residence to LARRIEN BROWN-AUSTIN, AKA "Chico," Victim #1, Victim #2, and others known and unknown to the Grand Jury, for commercial sex acts despite being previously advised by the Canton Police Department on May 11, 2018, that the next time CPD received a complaint regarding drug dealing and commercial sex at the Canton Residence, they would file for a Nuisance property and board up LARRY AUSTIN BROWN'S property.
- c. From in or about June 2018 through August 20, 2018, LARRY BROWN-AUSTIN received money and other things of value from commercial sex acts completed by Victim #1, Victim #2, and others known and unknown to the Grand Jury, as compensation for providing the Canton Residence as a place for commercial sex acts.
- d. In or about June 2018, the exact date unknown, SHANNON MARZANO met Victim #1 and purchased clothing for her.
- e. In or about June 2018, the exact date unknown, SHANNON MARZANO introduced Victim #1 to LARRIEN BROWN-AUSTIN and SHANNON MARZANO AND LARRIEN BROWN-AUSTIN, aka "Chico," offered Victim #1 a place to stay at the Canton Residence.
- f. On or about June 19, 2018, SHANNON MARZANO caused an ad to be posted on "Skip the Games" a known prostitution website, for Victim #1, and used LARRY BROWN-AUSTIN's property in Canton, Ohio for Victim #1 to engage in commercial sex acts.

- g. In or about June 2018, the exact date unknown, LARRIEN BROWN-AUSTIN, aka "Chico," demanded from SHANNON MARZANO a cut of the proceeds from a commercial sex act completed by Victim #1 so SHANNON MARZANO paid LARRIEN BROWN-AUSTIN, aka "Chico," approximately \$150.
- h. In or about June 2018, the exact dates unknown, LARRIEN BROWN-AUSTIN took control of the "Skip the Games" account associated with Victim#1 and began to keep all of the money paid to Victim #1 for commercial sex acts.
- i. In or about June 2018, the exact dates unknown, LARRIEN BROWN-AUSTIN, aka "Chico," sold Victim #2 heroin at the Canton Residence and then told Victim #2 she was not allowed to leave the residence.
- j. In or about June 2018, the exact dates unknown, LARRIEN BROWN-AUSTIN, aka "Chico," gave Victim #2 cycles of methamphetamine and heroin resulting in Victim #2 becoming addicted to the substances.
- k. In or about June 2018, the exact dates unknown, LARRIEN BROWN-AUSTIN, aka "Chico," withheld heroin from Victim #2 until she began experiencing withdrawal symptoms, and then told her that he would not provide her with additional heroin until after she engaged in commercial sex.
- l. In or about June 2018, the exact date unknown, LARRIEN BROWN-AUSTIN, aka "Chico," posted a commercial sex advertisement for Victim #2 on "Skip the Games," a known prostitution website.
- m. From in or about June 2018 through on or about August 20, 2018, SHANNON MARZANO used her maroon-colored Sport Utility Vehicle (SUV) to drive

Victim #1, and others known and unknown to the Grand Jury, to “out calls” (i.e., locations other than the location where Defendants or the victims were staying) for commercial sex.

- n. From in or about June 2018 through on or about August 20, 2018, LARRIEN BROWN-AUSTIN, aka “Chico,” paid SHANNON MARZANO to drive Victim #1, and others known and unknown to the Grand Jury, to appointments for commercial sex acts, and to purchase supplies, such as make-up, that Victim #1 and others could use before meetings to engage in commercial sex.
- o. From in or about June 2018 through on or about August 20, 2018, LARRIEN BROWN-AUSTIN, aka “Chico,” SHANNON MARZANO, and others known and unknown to the Grand Jury, used multiple cellphones with internet capability, including an LG-GSM smartphone, to communicate with commercial sex act customers on behalf of Victim #1, Victim #2, and others known and unknown to the grand jury.
- p. From in or about June 2018 through on or about August 20, 2018, LARRIEN BROWN-AUSTIN, aka “Chico,” and SHANNON MARZANO used a tracking application on their cellphones known as “Life360,” to keep track of the whereabouts of Victim #1, and others known and unknown to the Grand Jury, when the victims left the Canton Residence to engage in commercial sex acts.
- q. From in or about June 2018 through on or about August 20, 2018, SHANNON MARZANO and LARRIEN BROWN-AUSTIN, aka “Chico,” purchased

methamphetamine with money derived from commercial sex acts and distributed it to Victim #1, Victim #2, and others known and unknown to the Grand Jury.

- r. From in or about June 2018 through on or about August 20, 2018, LARRY AUSTIN-BROWN and LARRIEN BROWN-AUSTIN, aka "Chico," purchased heroin with money derived from commercial sex acts and distributed it to Victim #1, Victim #2, and others known and unknown to the Grand Jury.
- s. From in or about June 2018 through on or about August 17, 2018, LARRIEN BROWN-AUSTIN, aka "Chico," told Victim #1 and Victim #2 that they owed him a drug debt, even though they were required to give all of the money they earned from commercial sex acts to LARRIEN BROWN-AUSTIN, aka "Chico."
- t. From in or about June 2018 through on or about August 20, 2018, the exact dates unknown, LARRIEN BROWN-AUSTIN, aka "Chico," required Victim #1, Victim #2, and others known and unknown to the Grand Jury, to engage in commercial sex acts in the attic of the Canton Residence and to drop the money paid by the customers through a hole in the floor that led to LARRY AUSTIN-BROWN'S bedroom.
- u. Between on or about July 15, 2018 and on or about August 17, 2018, the exact date unknown, LARRIEN BROWN-AUSTIN, aka "Chico," strangled Victim #2 until she blacked out because Victim #2 forget to drop the money from a commercial sex act through the hole in the floor.
- v. From in or about June 2018 through August 20, 2018, LARRIEN BROWN-AUSTIN, aka "Chico," kept a firearm hidden in the Canton Residence in LARRY

BROWN-AUSTIN'S bedroom, and used the firearm to threaten Victim #1, and others known and unknown to the grand jury.

- w. From in or about June 2018 through August 20, 2018, LARRIEN BROWN-AUSTIN, aka "Chico," physically assaulted and threatened to assault Victim #1 if (i) she did not provide the money from the customer before the commercial sex act began, and (ii) he thought Victim #1 had withheld money from the appointment.
- x. From in or about June 2018 through August 20, 2018, the exact dates unknown, LARRIEN BROWN-AUSTIN, aka "Chico," forced Victim #1 into a cold shower to wake her up and get her ready for commercial sex act appointments.
- y. In or about August 2018, the exact date unknown, LARRIEN BROWN-AUSTIN, aka "Chico," encouraged, compelled and forced people known and unknown to the Grand Jury, to participate in the group sexual assault of Victim #2 that was recorded on his cellphone by SHANNON MARZANO.
- z. Between in or about June 2018 and August 20, 2018, the exact dates unknown, LARRIEN BROWN-AUSTIN, aka "Chico," forcibly returned Victim #1 to the Canton Residence after she attempted to escape from the house.
- aa. On or about August 16, 2018, LARRIEN BROWN-AUSTIN, aka "Chico," strangled Victim #2 and attempted to pull her into a car because Victim #2 escaped from the Canton Residence.
- bb. On or about August 20, 2018, LARRIEN BROWN-AUSTIN, aka "Chico," knowingly possessed a baggy containing methamphetamine in his pocket, pipes



used to smoke methamphetamine and crack, a digital scale, and a baggy containing methamphetamine in his bedroom at the Canton Residence

cc. On or about August 20, 2018, LARRIEN BROWN-AUSTIN, aka "Chico," possessed two black cell phones, a silver bag containing condoms, \$450 U.S. currency, and a Smith and Wesson, Model 32-20CTG, .32 caliber revolver pistol in the Canton Residence.

dd. On or about August 20, 2018, LARRIEN BROWN-AUSTIN, aka "Chico," whispered in Victim #1's ear, "Don't tell them anything about the prostitution," after law enforcement conducted a search of the Canton Residence.

All in violation of Title 18, United States Code, Section 1594(c).

COUNT 2

(Sex Trafficking by Force, Threats of Force Fraud, and Coercion, 18 U.S.C. §§ 1591(a)(1), (b)(1) and 2)

The Grand Jury further charges:

12. The allegations set forth in paragraphs 2 through 10(dd) of Count 1 are re-alleged herein.

13. From in or about June 2018 and continuing to on or about August 20, 2018, in the Northern District of Ohio, Eastern Division, Defendants LARRIEN BROWN-AUSTIN, aka "Chico," and SHANNON MARZANO, did knowingly recruit, entice, harbor, transport, provide, obtain, advertise, and maintain by any means, in and affecting interstate commerce, a person, namely Victim #1 (whose identity is known to the Grand Jury), knowing and in reckless disregard of the fact that means of force, threats of force, fraud, and coercion would be used to

cause Victim #1 to engage in a commercial sex act, in violation of Title 18, United States Code, Sections 1591(a)(1), (b)(1) and 2.

COUNT 3

(Sex Trafficking by Force, Threats of Force Fraud, and Coercion, 18 U.S.C. § 1591(a)(1) & (b)(1))

The Grand Jury further charges:

14. The allegations set forth in paragraphs 2 through 10(dd) of Count 1 are re-alleged herein.

15. From in or about June 2018 and continuing to on or about August 18, 2018, in the Northern District of Ohio, Eastern Division, defendant LARRIEN BROWN-AUSTIN, aka “Chico,” did knowingly recruit, entice, harbor, transport, provide, obtain, advertise, and maintain by any means, in and affecting interstate commerce, a person, namely Victim #2 (whose identity is known to the Grand Jury), knowing and in reckless disregard of the fact that means of force, threats of force, fraud, and coercion would be used to cause Victim #2 to engage in a commercial sex act, in violation of Title 18, United States Code, Sections 1591(a)(1) and (b)(1).

A TRUE BILL.

Original Document - - Signatures on file with the Clerk of Courts, pursuant to E-Government Act of 2002.